

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MOTION FOR LEAVE TO FILE A DOCUMENT UNDER SEAL

AND NOW comes the United States of America by its attorneys, Mary Beth Buchanan, United States Attorney for the Western District of Pennsylvania, and Thomas G. Voracek and Rita Genetti Calvin, Trial Attorneys, Tax Division, United States Department of Justice, and respectfully moves the Court to issue an Order directing that the Government's Motion for Sentencing Departure Based on Defendant's Substantial Assistance to Authorities in the above-captioned case, be sealed pending further Order of Court. In support of this Motion, it is respectfully submitted that this Motion contains sensitive information that could jeopardize the defendant's safety.

Respectfully submitted

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s/Thomas G. Voracek

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